



**MCI Telecommunications  
Corporation**

1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
202 887 2779  
FAX 202 887 2204

**Donald H. Sussman**  
Regulatory Analyst  
Federal Law and Public Policy

**ORIGINAL**

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JUN 30 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

June 30, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW TW-A325  
Washington, D.C. 20554

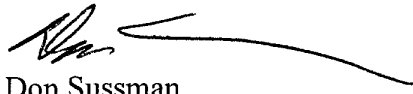
**Re: In the Matter of Defining Primary Lines, Classification of Centrex -Type  
Dormitory Lines, CC Docket No. 97-181**

Dear Ms. Salas:

Enclosed herewith for filing are the original and seven (7) copies of MCI WorldCom's  
Comments regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI  
WorldCom Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,



Don Sussman

Enclosure  
DHS

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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<b>In the Matter of:</b>	)	
	)	
<b>Defining Primary Lines</b>	)	<b>CC Docket No. 97-181</b>
	)	
<b>Classification of Centrex -Type</b>	)	
<b>Dormitory Lines</b>	)	

On June 16, 1999, BellSouth Telecommunications, Inc. (BellSouth) filed a petition for waiver of the Commission's rules that, if approved, would allow BellSouth to classify all centrex-type lines serving college and university dormitories as primary residential for the purpose of assessing presubscribed interexchange carrier charges (PICCs) and subscriber line charges (SLCs).<sup>1</sup> Pursuant to Public Notice released June 23, 1999, MCI WorldCom, Inc. submits its comments in the instant proceeding.

Under the Commission's rules, price cap incumbent local exchange carriers (ILECs) are permitted to assess a monthly bill to interexchange carriers (IXCs) of up to 0.53 for each presubscribed primary residential line and for each single-line business line, \$1.50 for each non-primary residential line, \$2.75 for each multi-line business line, and \$0.31 per centrex line. Beginning July 1, 1999, these amount are permitted to increase to \$1.04 for each presubscribed primary residential line and for each single-line business line, \$2.53 for each non-primary residential line, \$4.31 for each multi-line business line, and \$0.48 per centrex line.

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<sup>1</sup> In the Matter of Defining Primary Lines, Classification of Centrex-Type Dormitory Lines, CC Docket No. 97-181, Petition for Waiver, filed June 16, 1999.

The Commission recognized in its Access Charge Reform Reconsideration Order that, because the PICC amount varies significantly depending on whether a line is classified as residential primary or non-primary, multi-line business or single-line business, or centrex, the classification by ILECs of the IXC customer base into single, non-primary, multi-line or centrex categories has a substantial influence over PICC charges that IXCs must pay.<sup>2</sup> Consequently, to provide IXCs a fair opportunity to recover their costs, the Commission required the ILECs to provide IXCs with customer-specific information about the number and type(s) of PICCs they are assessing for each of the IXC's presubscribed customers.<sup>3</sup>

MCI WorldCom has no opinion with respect to the treatment of dormitory centrex-type lines as primary residential as long as the ILEC (i.e., BellSouth) provides the necessary line classification information to the IXC (i.e., MCI WorldCom) in a timely and auditable fashion. Such information includes the following class of customer information: Primary Residential, Non-Primary Residential, Single Line Business, Multi-Line Business, ISDN BRI (Basic Rate Interface), ISDN PRI (Primary Rate Interface), Business Centrex, Residence Centrex, ISDN BRI Residence, ISDN BRI Single Line Business, ISDN Multi-Line Business, Primary Residential Centrex Number, and Non-Primary Residential Centrex Number. MCI WorldCom argued to the

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<sup>2</sup>Second Order on Reconsideration and Memorandum Opinion and Order, 12 FCC Rcd. 16606 (1997) (Access Charge Reform Reconsideration Order), ¶16.

<sup>3</sup> Id. Specifically, the Commission stated that "If an IXC were to receive a bill for the aggregate amount of the PICCs assessed on its presubscribed lines and did not have access to information that indicates for which lines the LEC is assessing a primary or non-primary line residential PICC, the IXC would be unable to develop residential rates that accurately reflect the underlying costs of providing service over those lines." Id.

Commission in its February 1998 Emergency Petition that, absent such line classification information, MCI WorldCom has no way of determining or verifying whether a line is a primary or secondary residential, multi-line or single-line business, or centrex line.<sup>4</sup>

While the Commission issued an order — nearly one year ago to the day — that restates its requirement that all the price cap ILECs, including BellSouth, must provide such information to IXCs, BellSouth is one of several carriers that has continued to ignore the Commission's mandate.<sup>5</sup> Prior to granting BellSouth's instant waiver request, the Commission should require BellSouth to provide necessary line classification information through Customer Account Record Exchange (CARE), as was specifically required by the Commission's Access Charge Reform Reconsideration Order and by its June 3, 1998 CARE Order. Absent such a prerequisite, nothing prevents BellSouth from continuing its apparent disregard of Commission rules.

Respectfully submitted,  
MCI WORLDCOM, Inc.



Don Sussman  
1801 Pennsylvania Avenue, NW  
Washington, DC, 20006  
(202) 887-2779

June 30, 1999

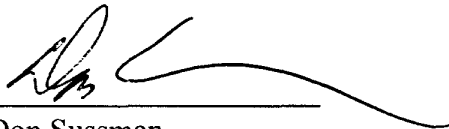
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<sup>4</sup> MCI Emergency Petition for Prescription, CC Docket No. 97-250, filed February 24, 1998.

<sup>5</sup> In the Matter of MCI Emergency Petition for Prescription, CC Docket No. 97-250, Memorandum Opinion and Order, released June 3, 1998 (1998 CARE Order).

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on June 30, 1999.

A handwritten signature in black ink, appearing to read 'Don Sussman', is written over a horizontal line.

Don Sussman  
1801 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
(202) 887-2779

**CERTIFICATE OF SERVICE**


I, Vivian Lee, do hereby certify that copies of the foregoing In the Matter of Defining Primary Lines Classification of Centrex-Type Dormitory Lines of MCI WorldCom, Inc. were sent on this 30th day of June, 1999, via first-class mail, postage pre-paid to the following:

Neil Fried\*  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-b431  
Washington, DC 20554

ITS\*  
1231 20th Street, NW  
Washington, DC 20037

M. Robert Sutherland  
Richard M. Sharatta  
Helen A. Shockey  
BellSouth Telecommunications  
1155 Peachtree Street, NE  
Atlanta, GA 30306-3610

\*HAND DELIVERED

  
Vivian Lee